

# Federal Personnel Manual System

FPM Letter 308-16

**SUBJECT:** Acceptance of Student Volunteer Service

Published in advance  
of incorporation in FPM

Chapter 308  
**RETAIN UNTIL SUPERSEDED**

Washington, D. C. 20415

November 8, 1979

## Heads of Departments and Independent Establishments:

1. The Office of Personnel Management published interim guidance for implementing Volunteer Service Programs for students in FPM Letter 308-13. This letter also invited agencies to comment on the guidelines or recommend, where appropriate, changes which they felt necessary for administering volunteer programs. In response to this invitation, 15 agencies and 2 labor organizations commented. Most suggested clarification of definitions or language changes to eliminate ambiguities.

2. Recommendations and suggested language changes or modification of definitions are included, if appropriate, in the enclosed revised guidelines in subchapter 7, FPM chapter 308. The major comments and OPM's position on each are addressed below:

### a. Impact Upon Existing Volunteer Programs

Prior to the enactment of the Civil Service Reform Act (CSRA), some departments and agencies were authorized by either enabling legislation or special statutes to administer volunteer programs. These programs are broader in scope and designed to accomplish specific goals and objectives enunciated by the Congress. Three agencies asked if 5 U.S.C. 3111 modified or superseded existing volunteer programs.

OPM's guidelines and instructions published in the enclosed subchapter are specifically addressed to student volunteer programs and do not modify or supersede other programs administered by agencies. Those agencies conducting such programs should continue to do as they have in the past.

### b. Documentation of Service

Of the 17 written comments received regarding the interim guidelines, only one registered an objection to the requirement that student volunteer services be documented through the use of Standard Form 50 (SF-50) "Notification of Personnel Action" or other OPM approved forms. There were two suggested changes in language but comments were in general agreement with the requirement. The remaining 14 comments were silent on this subject; however, they were in general agreement with the guidelines.

It is OPM's position on the subject of documentation, that it is necessary since there is a very real likelihood that future decisions may require accurate data regarding volunteer services performed by students and the overall number of students placed within departments and agencies.

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**Inquiries:** Staffing Management Branch, Staffing Services, 632-5678

**Code:** 308, Student Employment and Work-Study Program

**Distribution:** FPM



To enable agencies to be responsive to requests for this type of information, there should be some method for uniform presentation. We feel that the use of the SF-50 and the establishment of an Official Personnel Folder (OPF) on each student volunteer would be appropriate. However, where this personnel practice presents major problems, agencies should call this to the attention of OPM along with recommendation for alternative methods for accomplishing documentation objectives.

It would also seem prudent for agencies to process student placements through their Personnel Office. This would provide the means of controlling, if necessary, voluntary activities, provide some basis for being responsive to the concerns of employee organizations regarding non-paid service and, as the need arises, support claims for injuries sustained or under provision of the Tort Claims Act.

c. Comments of Labor Organizations

Comments were received from two labor organizations. One was in agreement with the guidelines and offered no recommended changes. The second suggested that "...reference should be made to the mutual obligation of agencies and the unions representing their employees to bargain collectively on all matters not specifically excluded by statute or government-wide regulation" and that OPM should "...call the agencies' attention to the need of involving collective bargaining representatives in designing 'agreements' for the purpose of training student volunteers."

In this regard, it is important to note that under 5 U.S.C. 3111(c) student volunteers are not Federal employees for any purpose other than injury compensation and tort claims purposes. Further, the agreements with educational institutions are not formalized documents which outline organized training programs.

d. Uncompensated Service

Agencies requested clarification of uncompensated service as used in 5 U.S.C. 3111. Specific questions raised by agencies asked if they may pay travel and transportation, provide benefits such as board and lodging, and reimbursement of tuition for training. This matter is now being reviewed, and guidance will be published under the FPM issuance system.

Students receiving stipends or other funds through fellowships, private foundations, loans or grants administered by the U. S. Office of Education or other departments and agencies are not precluded from participating under volunteer service programs established by 5 U.S.C. 3111.

e. Security Investigations

Under Executive Order 10450 each agency is required to establish a security program, therefore, questions related to the need for background investigations should be addressed to the agency's personnel security officer. Generally, if a student volunteer is assigned duties in non-sensitive areas, there will probably be no need for an investigation. On the other hand, if students are assigned to duty locations where there is easy access to classified or sensitive materials the agency should consider conducting an appropriate investigation. Students assigned to duties of a critical sensitive or non-critical



sensitive nature should undergo an appropriate investigation, including a full-field investigation, as needed. Agency personnel offices should consult with their personnel security officer for guidance.

3. Agencies are reminded that, in developing student volunteer service programs, appropriate recognition should be given to regulations governing: (1) protection of privacy in personnel records, (2) standards of conduct required by E.O. 11222, and (3) availability of official information and disclosure. These regulations are codified in title 5 parts 297, 735, and 294 respectively. Students should be made aware of these regulations in relationship to their assignment as volunteers. OPM intends to add a routine use to Privacy Act notices of systems of records for the Central and Government notices that would permit access by student volunteers whose assignments require them to use the records.
4. Final regulations on the Acceptance of Volunteer Service, part 308, title 5 code of Federal regulations were published in the Federal Register August 31, 1979.
5. This letter transmits a copy of subchapter 7 to FPM chapter 308 which provides guidelines for agency use in developing programs for acceptance of volunteer service. These guidelines also incorporate, where appropriate, suggested language changes and modification of definitions recommended by agencies.



Jule M. Sugarman  
Deputy Director

Attachments







## Subchapter 7: Acceptance of Volunteer Service

## 7-1 Purpose

The Civil Service Reform Act of 1978, Public Law 95-454, section 301 (5 U.S.C. 3111), authorized Federal departments and agencies to accept on behalf of the United States Government volunteer service. This chapter provides general guidance for agencies establishing educationally related work assignments for students in a nonpay status.

## 7-2 Definitions

As used in this chapter:

- (1) "Volunteer Service" under 5 U.S.C. 3111 is limited to services performed by a student, with the permission of the institution at which the student is enrolled, as part of an agency program established for the purpose of providing educational experience for the student. Such student service is to be uncompensated and will not be used to displace any employee or to staff a position which is a normal part of the agency's work force.
- (2) A "student" is an individual who is enrolled not less than half-time in an accredited high school, trade school, technical or vocational institute, junior college, college, university, or other accredited educational institution. An individual who is a student is deemed not to have ceased to be a student during an interim between school years if that period is not more than 5 months and if the student demonstrates to the satisfaction of the agency that he or she has a firm intention of continuing to pursue a course of study or training in the same or different educational institution during the school term immediately after the interim period of absence.
- (3) "Half-time student" is one enrolled in and carrying any combination of courses, research projects or special studies which meets one half or 50 percent of the minimum full-time academic workload standards and practices of the institution in which the student is enrolled. In case of doubt as to whether or not the student meets this statutory requirement, agencies should accept a written certification from the student's school that he or she is enrolled half-time under its academic program. The half-time requirement is statutory and agencies should make sure that this standard is followed.
- (4) "Agreement" is a written document developed jointly between the school and agency to outline the responsibilities of each organization. It should also be used to identify the conditions or limitations under which students may receive unpaid career-related experience. Included in such agreements should be the method, mutually agreed upon by each organization, for maintenance of attendance and performance records, particularly if the career-related assignment is for purpose of course credit.



### 7-3 Objectives

The acceptance of student volunteer service enables departments and agencies to contribute significantly to the enrichment of educational programs. In addition to enriching the educational process, program objectives are:

- (1) To bring about a stronger relationship between the efforts of educators and the occupational needs of Federal employers and students.
- (2) To provide opportunities for students to become involved in early career exploration as a basis for making realistic decisions regarding their future careers.
- (4) To provide exposure to the work environment as a means of encouraging students to develop work ethics and to acquaint them with various Federal missions.
- (4) To encourage student interest in new or developing occupations and professions.
- (5) To support affirmative action programs, through a career awareness approach, to assure that ethnic and racial minorities, women and the handicapped are informed of occupations available within Government.

### 7-4 Volunteer Service Agreements

General guidance. Each agency is authorized to develop student volunteer programs best suited to meet its needs. Although written agreements are not mandatory, it is recommended, based upon past experience with other student programs, that volunteer programs be conducted through written agreements with educational institutions or with non-profit organizations officially designated by schools or boards of education to coordinate the placement of students in nonpaid work assignments. Such organizations do not include commercial placement services or organizations which charge either student or agencies fees for placement referrals. The administrative level at which agreements are executed is a matter for agency determination. Agency headquarters should issue instructions to their field activities to assure that agreements developed at these levels are consistent with agency policy.

### 7-5 Student Eligibility and Status

- A. Minimum Age. The selection of students to participate should be in conformance with either Federal, State or local laws and standards regarding the employment of minors.
- B. Status. Students participating under agency programs are not considered to be Federal employees for any purpose other than for purposes:



- (1) Of the Federal Tort Claims provisions published in 28 U.S.C., 2671 through 2680. Claims arising as a result of student participation are to be administratively processed by the agency in accordance with regulations of the Department of Justice (28 U.S.C. 2672).
- (2) Of title 5 U.S.C. chapter 81, relative to compensation for injuries sustained during the performance of work assignments. Claims related to injuries should be referred to the Office of Workers' Compensation Programs, U. S. Department of Labor for adjudication.

#### 7-6 Documentation of Service

- A. General. Although student volunteers are not Federal employees, their service like any other type of volunteer service, may be creditable as related experience under examination rating schedules. Additionally, some participating schools, which award course credit for such service, may require certification of periods during which students rendered service. In light of this, volunteer service should be documented on the Standard Form 50 (SF-50) "Notification of Personnel Action" or OPM approved exception, thereto. The SF-50 should be completed as shown on exhibits A and B in appendix C to FPM chapter 308. Copies of the SF 50 should not be forwarded to the Office of Personnel Management, nor should agencies transmit data on student volunteers to the Central Personnel Data File (CPDF). Each SF-50 must carry the remark: "Under 5 U.S.C. 3111, a student volunteer is not a Federal employee for any purpose other than injury compensation and laws related to the Tort Claims Act. Service is not creditable for leave accrual or any other employee benefits."
- B. Entrance-on-Duty. Student volunteer assignments should be documented as "volunteer service-without compensation".
- C. Separations. When the period of volunteer service has ended, an SF-50 must be prepared to show termination (not resignation). The SF-50 should also include under item 30, "Remarks," a statement of the total service in hours or days rendered between the assignment and separation dates. Also included under the remarks should be a brief description of the duties performed and that termination is based on expiration of assignment or the volunteer's request. Each SF-50 must carry the remark: "Under 5 U.S.C. 3111, a student volunteer is not a Federal employee for any purpose other than injury compensation and laws related to the Tort Claims Act. Service is not creditable for leave accrual or any other employee benefits."
- D. Records. For each student volunteer, agencies should establish an Official Personnel Folder (OPF) to contain copies of assignments, and termination SF-50's and either an SF-171 or 173 of student volunteer. These documents should be filed on the right (permanent) side of the OPF. When volunteer service is terminated, the OPF should be sent to the National Personnel Records Center, following the instructions in FPM Supplement 293-31.



- E. Service Records Cards. An agency may, if it wishes, prepare an SF-7 service record card or similar document to record appointment and termination of student volunteers. If a SF-7 or similar agency record is prepared, it must be annotated to show that periods of service were not Federal employment.

#### 7-7 Program Evaluation

Evaluation. Each agency should schedule periodic reviews and evaluations of their student volunteer programs. Such reviews should form the basis for establishing future program objectives. The review should include:

- (1) Careful assessments of program in terms of its compliance with 5 U.S.C. 3111 and agency instructions.
- (2) Evaluation of the program in terms of the agency's own goals and objectives.
- (3) An assessment of improvement in relationships with students and schools with which the agency has agreements.

#### 7-8 Program Implementation

- A. Program responsibility. Each agency should designate a member of its staff of its central and major subordinate organizations to keep currently informed on student volunteer programs. The responsibilities of such staff should include the promulgation of internal instructions and to serve as the focal point of contact with schools and other institutions interested in assigning students in nonpaid internships. Every effort should be made to inform student volunteers about employment opportunities within the employing activity and the procedures to be followed in order to qualify for career appointments.
- B. Field Advisory Service. Agency field activities should be kept informed of new developments or changes in agency policy. Additionally, each field activity should designate a member of its staff to carry out the primary responsibilities for the program and to serve as liaison with officials of educational institutions.
- C. Public Affairs. Coverage of student volunteer programs should be included in public information and public relations activities of agencies whenever appropriate.

#### 7-9 Equal Opportunity

Heads of departments and agencies have the responsibility for providing leadership in establishing, maintaining, and carrying out a continuing affirmative action program designed to promote equal employment opportunity. This policy of equal opportunity applies to, and must be an integral part of, every aspect of agency personnel policy and practice in employment, development, advancement, and treatment of employees. The policy also applies in the selection of student volunteers even though they are not deemed to be employees.



Agencies should also be cognizant of the fact that most students who volunteer may be in the position financially to render service without compensation. Nevertheless, efforts must be made to assure that all students have equal access to participate under this program.

#### 7-10 Relationship to Other Student Programs

Departments and agencies have for a number of years actively supported student employment programs, i.e., summer employment programs, Stay-in-School and cooperative education programs authorized under provisions of E.O. 12015. Agencies are reminded that each of these programs have specific objectives and should continue to receive active support. Special concern was expressed over potential adverse impact on the summer aide and summer employment programs; therefore, these programs are not curtailed because of increased volunteer service during the summer months.

With the enactment of section 301 of the Civil Service Reform Act of 1978, which authorized the acceptance of volunteer service, both school officials and agency representatives have expressed apprehension that less emphasis will be given to the established student employment programs. The real concern relates to the fact that most students in school today need the earnings from employment to subsidize educational expenses. Additionally, they expressed concern regarding the possibility of morale problems if students, both volunteer and those paid for services rendered, were simultaneously scheduled to the same duty assignments; therefore, agencies should make every effort to design volunteer programs to avoid conflict with established student employment programs.

Agencies should establish time limits on the amount of volunteer service accepted from a specific individual to avoid situations developing that imply that service with an agency during the school year will insure a job in the future.

The Federal Government, as an employer, in supporting employment programs for students has provided an example of outstanding leadership for other employers within our economy. Agencies are urged to continue the support of all student programs.

#### 7-11 Security Investigation

Under Executive Order 10450 each agency is required to establish a security program, therefore, questions related to the need for background investigations should be addressed to the agency's personnel security officer. Generally, if a student volunteer is assigned duties in non-sensitive areas, there will probably be no need for an investigation. On the other hand, if students are assigned to duty locations where there is easy access to classified or sensitive materials, the agency should consider conducting an appropriate investigation. Students assigned to duties of a critical sensitive or non-critical sensitive nature should undergo an appropriate investigation, including a full-field investigation, as needed. Agency personnel offices should consult with their personnel security officer for guidance.



## 7-12 Privacy, Standards of Conduct, and Disclosure of Information

Agencies are reminded that, in developing student volunteer service programs, appropriate recognition should be given to regulations governing: (1) protection of privacy in personnel records, (2) standards of conduct required by E.O. 11222, and (3) availability of official information and disclosure. These regulations are codified in title 5 parts 297, 735, and 294 respectively. Students should be made aware of these regulations in relationship to their assignment as volunteers.

## 7-13 Reporting

The Office of Personnel Management, as a basis for consolidation of statistical and other data regarding Government-wide participation is requiring an annual report for the Calendar Year 1979. This report should be submitted not later than January 18, 1980. Reports should be submitted not later than January 1980. This report has been cleared in accordance with FPMR 101-11.11 and assigned interagency report control number 0231-OPM-OT.

Agency reports should cover the results of their own evaluation and should address results, any problems encountered, and recommendations. As a minimum, a statistical summary should be included to show the number of participants, academic levels, and the State in which students provided volunteer service during the period January 1979 through December 31, 1979. The data should be submitted in the following format:

STATE OF DUTY STATION	ACADEMIC LEVEL									
	TOTAL			HIGH SCHOOL	TRADE SCHOOL	VOCATIONAL OR TECH. INSTITUTION	TWO-YEAR COLLEGES	COLLEGES	GRADUATE SCHOOLS	OTHER
	TOTAL	MALE	FEMALE							
ALABAMA										
ALASKA										
ARIZONA										
* * *										
*MARYLAND										
*VIRGINIA										
X X X X										
WYOMING										
WASHINGTON, D. C. SMSA										
TOTAL ALL AREAS										

\*Not in Washington, D. C., SMSA

Beginning with Calendar Year 1980, there will be need for a periodic (quarterly) summary of participants. A reporting requirement and methodology, probably through a new 113 report series, is being developed. Specific instructions will be issued under a separate Federal Personnel Manual issuance after appropriate consultations and clearances.



STANDARD FORM 50—Rev. December 1961  
U.S. Civil Service Commission  
FPM Chap. 295

## NOTIFICATION OF PERSONNEL ACTION

(FOR AGENCY USE)

(For circled items, fill in actual data pertaining to Volunteer or Agency)

1. NAME (CAPS) LAST-FIRST-MIDDLE		MR.—MISS—MRS.	2 (FOR AGENCY USE)	3. BIRTH DATE (Mo., Day, Year)	4. SOCIAL SECURITY NO.
5. VETERAN PREFERENCE 1—NO 2—5 PT. 3—10 PT. DISAB. 4—10 PT. COMR. 5—10 PT. OTHER			6. TENURE GROUP	7. SERVICE COMP. DATE	
9. FEGLI 1—COVERED (Regular only—declined Optional) 2—INELIGIBLE 3—WAIVED 4—COVERED (Reg & Opt)			10. RETIREMENT 1—CS 2—FICA 3—FS 4—NONE 5—OTHER		11. (FOR CSC USE)
12. CODE NATURE OF ACTION Volunteer Service—Without Compensation			13. EFFECTIVE DATE (Mo., Day, Year)		14. CIVIL SERVICE OR OTHER LEGAL AUTHORITY
15. FROM: POSITION TITLE AND NUMBER			16. PAY PLAN AND OCCUPATION CODE	17. (a) GRADE OR LEVEL (b) STEP OR RATE	18. SALARY
19. NAME AND LOCATION OF EMPLOYING OFFICE					

20. TO: POSITION TITLE AND NUMBER Student Volunteer		21. PAY PLAN AND OCCUPATION CODE	22. (a) GRADE OR LEVEL (b) STEP OR RATE	23. SALARY
24. NAME AND LOCATION OF EMPLOYING OFFICE				
25. DUTY STATION (City—county—State)				26. LOCATION CODE
27. APPROPRIATION		28. POSITION OCCUPIED 1—COMPETITIVE SERVICE 2—EXCEPTED SERVICE	29. APPORTIONED POSITION FROM: TO: STATE 1—PROVED-1 2—WAIVED-2	

30. REMARKS: ☐ A. SUBJECT TO COMPLETION OF 1 YEAR PROBATIONARY (OR TRIAL) PERIOD COMMENCING ☐ B. SERVICE COUNTING TOWARD CAREER (OR PERMANENT) TENURE FROM: ☐ C. DURING PROBATION

SEPARATIONS: SHOW REASONS BELOW, AS REQUIRED "CHECK IF APPLICABLE: ☐

Expected to work (number) hours per week.

Under 5 U.S.C. 3111 a Student Volunteer is NOT a Federal employee for any purposes other than injury compensation or laws related to Tort Claims Act. Service is not creditable for leave accrual or any other employee benefits.

31. DATE OF APPOINTMENT AFFIDAVIT (Accessions only)	34. SIGNATURE (Or other authentication) AND TITLE
32. OFFICE MAINTAINING PERSONNEL FOLDER (If different from employing office)	
33. CODE EMPLOYING DEPARTMENT OR AGENCY	35. DATE



NOTIFICATION OF PERSONNEL ACTION

Attachment 3 to

UNIVERSITY OF FLORIDA



3 1262 08729 3717

(FOR AGENCY USE)

(For circled items, fill in actual data pertaining to Volunteer or Agency)

1. NAME (CAPS) LAST-FIRST-MIDDLE		MR.-MISS-MRS	2 (FOR AGENCY USE)	3 BIRTH DATE (Mo., Day, Year)	4 SOCIAL SECURITY NO.
5. VETERAN PREFERENCE 1—NO 2—5 PT. 3—10 PT. DISAB. 4—10 PT. COMP. 5—10 PT. OTHER			6 TENURE GROUP	7. SERVICE COMP. DATE	
9. FEGLI 1—COVERED (Regular only—declined Optional) 2—INELIGIBLE 3—WAIVED 4—COVERED (Reg. & Opt.)			10. RETIREMENT 1—CS 2—FICA 3—FS 4—NONE		11. (FOR CSC USE)
12. CODE NATURE OF ACTION Termination of Volunteer Service—Without Compensation			13. EFFECTIVE DATE (Mo., Day, Year)		14. CIVIL SERVICE OR OTHER LEGAL AUTHORITY
15. FROM: POSITION TITLE AND NUMBER  Student Volunteer			16. PAY PLAN AND OCCUPATION CODE		17. (a) GRADE OR LEVEL (b) STEP OR RATE
19. NAME AND LOCATION OF EMPLOYING OFFICE					

20. TO: POSITION TITLE AND NUMBER		21. PAY PLAN AND OCCUPATION CODE	22. (a) GRADE OR LEVEL (b) STEP OR RATE	23. SALARY
24. NAME AND LOCATION OF EMPLOYING OFFICE				

25. DUTY STATION (City—county—State)		26. LOCATION CODE		
27. APPROPRIATION		28. POSITION OCCUPIED 1—COMPETITIVE SERVICE 2—EXCEPTED SERVICE		29. APPORTIONED POSITION FROM: TO: STATE 1—PROVED-1 2—WAIVED-2

30. REMARKS: ☐ A. SUBJECT TO COMPLETION OF 1 YEAR PROBATIONARY (OR TRIAL) PERIOD COMMENCING ☐ B. SERVICE COUNTING TOWARD CAREER (OR PERMANENT) TENURE FROM: ☐ C. OURING PROBATION

SEPARATIONS: SHOW REASONS BELOW, AS REQUIRED. CHECK IF APPLICABLE:

Under 5 U.S.C. 3111 Volunteer Service provided during the period \_\_\_\_\_ through \_\_\_\_\_  
Total number of hours provided \_\_\_\_\_.

Brief description of work performed:

Termination is based upon (1) Expiration of Assignment ☐ or at (2) Volunteer's Request ☐

Under 5 U.S.C. 3111, a Student Volunteer is NOT A Federal employee for any purpose other than injury compensation and laws related to the Tort Claims Act. Service is not creditable for leave accrual or any other employee benefits.

31. DATE OF APPOINTMENT AFFIDAVIT (Accessions only)		34. SIGNATURE (Or other authentication) AND TITLE	
32. OFFICE MAINTAINING PERSONNEL FOLDER (If different from employing office)			
33. CODE	EMPLOYING DEPARTMENT OR AGENCY		35. DATE